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DISTRICT COURT
CLARK COUNTY, NEVADA

Mark Streeter,) Case No: 2:18-cv-02335-RFB-DJA

Plaintiff,
)

Arman Izadi a/k/a Alexander Izadi a/k/a

Arman Izadi a/k/a Alexander Izadi a/k/a Armani; Sancho Van Ryan a/k/a Sancho Jinadasa and Glow Threads, Inc.

Case No: 2:18-cv-02335-RFB-DJA

**STIPULATION AND ORDER
CONSENTING TO THE FILING
OF A FIRST AMENDED COMPLAINT
AND EXTENDING TIME TO
RESPOND TO MOTION TO DISMISS**

[Second Request]

Plaintiff Mark Streeter and Defendants Arman Izadi, Sancho Van Ryan, and Glow Threads, Inc. by and through their counsel, stipulate as follows:

1. Defendants filed a Motion to Dismiss (ECF No. 14) the First Amended Complaint on February 27, 2020. A response to that motion is due on March 12, 2020.

2. Plaintiff has indicated a desire to file an Amended Complaint rather than litigate the issues raised in the Motion to Dismiss under the current Complaint.

3. In a stipulation submitted to the Court on March 11, 20120 (EDF No. 14), Defendants consented to the filing by Plaintiff of a First Amended Complaint. To provide time to prepare it, and to avoid the need to file a response to the Motion to Dismiss (ECR No. 14) the Parties further stipulated to extend the Motion to Dismiss response date to March 23, 2020, agreeing that if the Amended Complaint were filed by that date, the Motion to Dismiss would be

withdrawn (without prejudice to refiling).

4. Because of the unprecedented disruptions caused by the COVID-19 crisis, Counsel for Plaintiff has been delayed in preparing the First Amended Complaint.

5. The Parties stipulate that, Plaintiff shall file the planned First Amended Complaint on or before March 27, 2020. To allow time for that to happen which would moot the currently pending motion to dismiss, the Parties stipulate that the time for Plaintiff to respond to the Motion to Dismiss shall be extended to March 27, 2020 as well to avoid unnecessary motions practice on the existing motion to dismiss.

5. Defendants by consenting to the above reserve all rights, arguments and defenses and their stipulation consenting the filing of a First Amended Complaint in no way agrees or concedes that sufficiency of that amended pleading and they reserve the right to file any appropriate motion in response.

6. If Plaintiff files the First Amended Complaint on March 27, 2020, Defendants shall have until April 17, 2020, in which to answer or otherwise respond.

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1 7. This is the second request to extend time to respond to the Motion to Dismiss
2 (ECF No. 14) and is made in good faith and not for the purpose of delay.

3 Dated this 23th day of March 2020.

4 KENNEDY & COUVILLIER

CLARK HILL PLLC

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7 By: /s/ Todd E. Kennedy, Esq.
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13 *Counsel for Defendants Arman Izadi,
Sancho Van Ryan, and Glow Threads, Inc.*

14 **ORDER**

15 IT IS SO ORDERED.

16 
17 RICHARD F. BOULWARE, II
18 UNITED STATES DISTRICT JUDGE

19 DATED this 24th day of March, 2020.